

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

EMILY COULTER,)	Case No.: 5:18-cv-1538
)	
Plaintiff,)	
)	
vs.)	
)	<u>PLAINTIFF'S PRETRIAL</u>
CHASE BANK USA, N.A.,)	<u>MEMORANDUM</u>
Defendant.)	
)	
)	
)	
)	

Plaintiff, Emily Coulter, by and through undersigned counsel, hereby respectfully submits this supplement to her Pre-Trial Memorandum containing party stipulations in preparation for the upcoming conference currently scheduled for April 8, 2020.

1. Special comments regarding legal issues, stipulations, amendments of pleadings, or other appropriate matters:

a. The parties will provide the court with stipulations prior to the conference.

1. Plaintiff had two credit card accounts with Chase bearing account number 426684137180XXXX and 441712304702XXX (the "Accounts").

2. On April 29, 2015, Plaintiff filed for bankruptcy under 7 in the United States Bankruptcy Court for the Eastern District of Pennsylvania.

3. Plaintiff identified the Accounts as belonging to her in the schedules she filed in her bankruptcy proceeding.

4. On September 3, 2015, Plaintiff received a discharge in her bankruptcy.

5. Experian has a data field called the "Date of Status" on its consumer disclosures.

6. Plaintiff's July 24, 2017 Experian consumer disclosure report showed "July 2017" as the "Date of Status" for the Accounts.
7. On October 29, 2017, Chase received notice of a dispute concerning the Accounts from Experian via ACDVs.
8. Chase responded to Experian by the November 8, 2017 response date.
9. The "Date of Status" for the Chase Accounts in Experian's October 30, 2017 Experian "Results Summary" appeared as "April 2015" and appeared that way on subsequent Experian consumer disclosures.

Dated: April 7, 2020.

Respectfully submitted,

/s/ Nicholas Linker

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of April, 2020 a true and correct copy of the foregoing document was sent to all counsel of record via the Court's ECF system.

/s/ Nicholas Linker
Nicholas Linker, Esq.